Confirmation Number: 9243753

Louisiana LaFayette Parish

Clerk of Courts - IN OFFICE

Transaction Details

Employee

HANNAH DUFRENE

Name

KRIS P KIEFER

Purpose of Payment

20221832 ROBERTSON V. TOSHHUJAEV



Credit Card Payment Address Information

Order Number

9243753

Customer Name

KRIS P KIEFER

Email Address

Address

2310 METAIRIE ROAD

METAIRIE, LA 70001

Phone Number

(504) 828-3313

Credit Card Number

3XXX XXXX XXX1 016

Credit Card Type

AMEX

Expiration Date

1224

Operator Name

Transaction Time

5/6/2022 12:19:14 PM

Authorization Code

213890

Convenience Fee **Authorization Code**

263792

Transaction ID

2043941514

Purchase Type

sale

Agency Total

21.00

Convenience Fee

\$1.00

Total Amount

22.00

Charged to Card

ONE OR BOTH CHARGES WILL APPEAR AS PAYGOV.US ON YOUR CARD STATEMENT.

For questions about this payment, please call (866) 480-8552.

PayGov, LLC

5144 E. Stop 11 Rd. Indianapolis, IN 46237

http://paygov.us

Disputing a charge with your credit card company may result in an additional \$40.00 charge.

Case 1:22-cv-01442 Document 1-3 Filed 05/27/22 Page 2 of 19 PageID #: 12

Lafayette Parish, LA Louis J. Perret Clerk of Court

P.O. Box 2009 Lafayette, LA 70502-2009 Phone Number: (337) 291-6400

Official Receipt: 2022-00038659

Printed On: 05/06/2022 at 11:20:24 AM **By**: 315 on LCC-CRFRONT1

Customer:

KRIS P KIEFER

2310 METAIRIE ROAD METAIRIE, LA 70001

Date Recorded: May 06, 2022

Instrument ID **Recorded Time Amount** 11:20:13 AM \$16.00

Transaction: COPIES (CIVIL)

Remarks: 20221832 ROBERTSON V. TOSHHUJAEV

Accounts **Amount** Copies \$16.00

Instrument ID **Recorded Time Amount** 11:20:14 AM \$5.00

Transaction: CERTIFIED PAGES (CIVIL)

Remarks: 20221832 ROBERTSON V. TOSHHUJAEV

Accounts **Amount Certified Copies** \$5.00 Copies \$0.00

> Total Due: \$21.00

Paid By CREDIT CARD: \$21.00 \$0.00

Change Tendered:

THANK YOU FOR ALLOWING US TO SERVE YOU -LOUIS J. PERRET, CLERK OF COURT

Page 1 of 1

Civil Records

LOUIS J. PERRET CLERK OF COURT, PARISH OF LAFAYETTE P. O. BOX 2009 LAFAYETTE, LA 70502

Telephone: (337) 291-6303 Fax: (337) 291-6392

STATE OF LOUISIANA PARISH OF LAFAYETTE

OFFICE OF THE CLERK OF COURT 15TH JUDICIAL DISTRICT COURT

I, Hannah C. Dufrene, Deputy Clerk of Court, in and for the Parish of Lafayette, State of Louisiana, do hereby certify that the attached documents are true and correct copies from the civil suit entitled:

SKYE ROBERTSON

VS DOCKET NUMBER: C-20221832 D

DIAMOND CARGO INC, ET AL

Consisting of 16 pages, the original of which documents are on file in the Lafayette Parish Clerk of Court Office.

Lafayette, Louisiana, this MAY 6, 2022.

Hannah C. Dufrene, Deputy Clerk of Court

Lafayette Parish

C-20221832 D



2505 Verot School Road Lafayette, LA 70508 337-347-7565 – Telephone 337-704-2805 - Facsimile

April 8, 2022

STAMPED COPY GIVEN

VIA HAND DELIVERY

Lafayette Parish Clerk of Court ATTN: CIVIL 800 S. Buchanan Street Lafayette, LA 70501

RE: Skye Robertson

v. Buzrukhuja Toshhujaev, et al

Dear Clerk:

Please find enclosed for filing a Petition for Damages, Request for Notice, and Civil Case Reporting Form. Please return a filed copy to my office. A check in the amount of \$650.00 is enclosed to cover the costs.

Please forward all service returns to my office. If you have any questions, please contact Gabbie in my office at 337-347-7565. Thank you.

Sincerely yours,

Brian Colomb

BCC/gmd Enclosures

SKYE ROBERTSON	15 TH JUDICIAL DISTRICT COURT
VERSUS	DOCKET NO.
BUZRUKHUJA TOSHHUJAEV, ET AL	LAFAYETTE PARISH, LOUISIANA

PETITION FOR DAMAGES

NOW INTO COURT, through undersigned counsel, comes petitioner, SKYE ROBERTSON, a citizen of the State of Louisiana, who respectfully presents the following petition for damages, to wit:

1.

Made defendants herein are:

- a) DIAMOND CARGO INC., believed to be a foreign corporation, domiciled and incorporated in Ohio, and the owner of the eighteen-wheeler driven by BUZRUKHUJA TOSHHUJEAV involved in the collision at issue and/or was the employer of the driver of said eighteen-wheeler, defendant, BUZRUKHUJA TOSHHUJAEV, and, as such, is liable jointly, severally and in solido with one or more defendants for all damages which may be cast in favor of petitioner, plus costs and interest from the date of judicial demand;
- b) PROGRESSIVE CASUALTY INSURANCE COMPANY, believed to be a foreign insurance company authorized to do and doing business in the State of Louisiana at all times relevant herein that, based upon information and belief, maintained one or more policies of primary and/or excess liability insurance insuring BUZRUKHUJA TOSHHUJAEV, DIAMOND CARGO INC., and/or the eighteen-wheeler being operated by BUZRUKHUJA TOSHHUJAEV involved in the subject collision, against liability in the premises and, as such, is liable jointly, severally and in solido with one or more defendants for all damages which may be cast in favor of petitioner, plus costs and interest from the date of judicial demand; and
- c) BUZRUKHUJA TOSHHUJAEV, believed to be a person of the full age of majority and a resident of and domiciled in either New York or Ohio, and who was the owner and/or driver of the eighteen-wheeler that was involved in the subject collision and, as such, is liable jointly, severally and in solido with one or more defendants for all damages which may be cast in favor of petitioner, plus costs and interest from the date of judicial demand.

2.

The defendants, **DIAMOND CARGO INC.**, **PROGRESSIVE CASUALTY INSURANCE COMPANY**, and **BUZRUKHUJA TOSHHUJAEV**, are liable, jointly, severally and *in solido* to the petitioner for the harms and losses which he sustained, together with legal interest from the date of judicial demand and costs of these proceedings for the following reasons, to wit:

On or about April 13, 2021, at approximately 3:10 p.m., petitioner, **SKYE ROBERTSON**, was driving an eighteen-wheeler traveling eastbound in the left lane of I-10, in Lafayette, Louisiana. At the same time, **BUZRUKHUJA TOSHHUJAEV** was also driving an eighteen-wheeler, behind **MR. ROBERTSON**. As **MR. ROBERTSON** approached the overpass near Ambassador Caffery Parkway he was forced to bring his eighteen-wheeler to a stop due to congestion on I-10. While **MR. ROBERTSON** was stopped, **BUZRUKHUJA TOSHHUJAEV** caused the front of his eighteen-wheeler to strike the rear of **MR. ROBERTSON'S** truck.

4.

At all times pertinent hereto, petitioner, **SKYE ROBERTSON**, drove his vehicle safely and with due prudence. **SKYE ROBERTSON** bears no fault in causing the subject collision.

5.

Petitioner avers that the below described injuries, harms, and losses were caused solely by the negligence and fault of defendants, **DIAMOND CARGO INC.** and/or **BUZRUKHUJA**TOSHHUJAEV, in the following, non-exclusive, particulars, to wit:

- a. In operating a vehicle in violation of the traffic laws of Louisiana;
- b. Failing to maintain control of the vehicle;
- c. Failing to maintain a proper outlook;
- d. Traveling at an unreasonably dangerous speed for the traffic and/or roadway conditions as they existed at the time of the collision;
- e. Failing to do what should have been done to avoid the collision set forth herein;
- f. Careless and/or negligent operation;
- g. Violating any and all applicable laws, rules, regulations, and/or standards including, but not limited to, La. R.S. 32:58;
- h. Negligent hiring, training, supervision and/or entrustment;
- i. Petitioner also invokes the presumption of fault of a motorist who strikes another motorist from the rear; and
- j. All other acts of negligence and/or fault that will be shown at the trial of this matter.

6.

Upon information and belief, at all times pertinent hereto, defendant, BUZRUKHUJA

TOSHHUJAEV, was working as an employee of defendant, DIAMOND CARGO INC., and
was driving the eighteen-wheeler with the permission of his employer.

7.

DIAMOND CARGO INC. is vicariously liable for the actions of BUZRUKHUJA

TOSHHUJAEV set forth herein under the doctrine of *Respondent Superior* and/or Louisiana law.

8.

Directly and solely as a result of the collision in question, **SKYE ROBERTSON** suffered various injuries and, as a result, is entitled to recover all available damages including, but not limited to:

- a. Physical pain and suffering past, present, and future;
- b. Mental anguish and/or emotional distress past, present, and future;
- c. Disability and/or impairment past, present, and future;
- d. Lost Wages and/or loss of earning capacity past, present, and future;
- e. Loss of enjoyment of life past, present, and future;
- f. Medical expenses past, present, and future; and
- g. Any and all other damages which will be established at the time of trial.

9.

Petitioner, SKYE ROBERTSON, is therefore entitled to damages for the items set forth in such amounts as are reasonable in the premises.

10.

Petitioner is informed, believes and therefore alleges that at the time of the collision at issue the defendant, PROGRESSIVE CASUALTY INSURANCE COMPANY, had issued a liability insurance policy to DIAMOND CARGO INC. and/or BUZRUKHUJA TOSHHUJAEV, and under the laws of the State of Louisiana said policy was in full force and effect at the time of the subject collision, and which insurance inures to the benefit of Petitioner under the provisions of the Louisiana Direct Action Statute, L.A. R.S. 22:1269.

11.

Petitioner further alleges on information and belief that under the terms of the said policy,

PROGRESSIVE CASUALTY INSURANCE COMPANY obligated itself to pay any and all

damages caused to Petitioner as a result of the negligence and/or fault of DIAMOND CARGO

INC. and/or BUZRUKHUJA TOSHHUJAEV in the collision at issue herein.

12.

Pursuant to the provisions of the Louisiana Code of Civil Procedure, Article 1423, et sec.,

Petitioner is entitled to a certified copy of all insurance policies issued to and/or otherwise insuring

DIAMOND CARGO INC. and/or BUZRUKHUJA TOSHHUJAEV for the claims made by

Petitioner herein. Petitioner herein requests a certified copy of any and all such policies of insurance within thirty (30) days of service of the petition upon them.

13.

DIAMOND CARGO INC., PROGRESSIVE CASUALTY INSURANCE COMPANY, and BUZRUKHUJA TOSHHUJAEV are therefore liable, jointly, severally, and in solido, unto the Petitioner for all damages sustained by Petitioner in said collision.

14.

The value of Petitioner's claim exceeds \$75,000.00.

15.

Venue is proper in this judicial district pursuant to La. C.C.P. art. 74 since the collision occurred in Lafayette Parish.

WHEREFORE, PETITIONER PRAYS that defendants, DIAMOND CARGO INC., PROGRESSIVE CASUALTY INSURANCE COMPANY, and BUZRUKHUJA TOSHHUJAEV, be duly cited to appear and answer this petition and that after due proceedings are had and the lapse of all legal delays that there be a judgment herein and in favor of petitioner, SKYE ROBERTSON, and against defendants, DIAMOND CARGO INC., PROGRESSIVE CASUALTY INSURANCE COMPANY, and BUZRUKHUJA TOSHHUJAEV, jointly, severally and *in solido*, for damages in an amount which is reasonable within the premises, together with legal interest thereon from date of judicial demand until paid and for all costs of these proceedings.

PETITIONER FURTHER PRAYS for any and all additional legal equitable relief which this Honorable Court may deem necessary and proper.

Respectfully Submitted

BRIAN C. COLOMB (Bar No. 25625)

2505 Verot School Road Lafayette, LA 70508 Telephone: 337-541-6584

Fax: 337-704-2805 brian@getgordon.com

ATTORNEYS FOR PETITIONER, SKYE ROBERTSON

PLEASE SERVE:

DIAMOND CARGO INC.

Through the Long Arm Statute: Nodir Ashirov 5535 Sterling Lakes Circle, At. 207 Mason, OH 45040

PROGRESSIVE CASUALTY INSURANCE COMPANY

Through its agent for service of process: Louisiana Secretary of State 8585 Archives Avenue Baton Rouge, LA 70809

BUZRUKHUJA TOSHHUJAEV

Through the Long Arm Statute: 1738 Dahill Road, #2 Brooklyn, NY 11223

BUZRUKHUJA TOSHHUJAEV

Through the Long Arm Statute: 3927 S Chalet Circle Beavercreek, OH 45431

SKYE ROBERTSON

15TH JUDICIAL DISTRICT COURT

VERSUS

DOCKET NO. _____

BUZRUKHUJA TOSHHUJAEV,
ET AL

LAFAYETTE PARISH, LOUISIANA

REQUEST FOR NOTICE

Please take notice that BRIAN C. COLOMB, attorney for petitioner, does hereby request written notice of the date of trial of the above matter as well as notice of hearings (whether on merits or otherwise), orders, judgments, and interlocutory decrees, and any and all formal steps taken by the parties herein, the Judge or any member of Court, as provided in Louisiana Code of Civil Procedure of 1960, particularly Articles 1572, 1913, and 1914.

Respectfully Subroyted,

BRIAN C. COLOMB (Bar No. 25625)

2505 Verot School Road Lafayette, LA 70508 Telephone: 337-541-6584

Fax: 337-704-2805 brian@getgordon.com

ATTORNEYS FOR PETITIONER, SKYE ROBERTSON

APPENDIX 9.6 LOUISIANA CIVIL CASE REPORTING

Civil Case Cover Sheet - LA. R.S. 13:4688, Part G, §13 of the Louisiana Supreme Court General Administrative Rules, and Appendix 9.6 of the Louisiana District Court Rules

This civil case cover sheet shall be completed by counsel for the petitioner, counsel's authorized representative, or by the self-represented litigant (if not represented by counsel) and submitted with the original petition filed with the court. The information should be the best available at the time of filing. This information does not constitute a discovery request, response or supplementation, and is not admissible at trial.

Suit Caption:

SKYE ROBERTSON

ON ENOBER GON

PROGRESSIVE O	VS. CASUALTY INSURANCE COI	MPANY, ET
Court: 15TH JDC	Docket Number: _	C-20221832
Parish of Filing: LAFAYETTE	Filing Date:	APRIL 8, 2022
Name of Lead Petitioner's Attorney:	Brian C. Colomb	
Name of Self-Represented Litigant:		
Number of named petitioners: 1	Number of r	named defendants: 3
Type of Lawsuit: Please check the car no more than 3 categories should be		propriately apply to this su
Auto: Personal Injury Auto: Wrongful Death Asbestos: Property Damage Product Liability Intentional Bodily Injury Intentional Wrongful Death Business Tort Defamation Environmental Tort Intellectual Property Legal Malpractice Other Professional Malpractice Maritime Wrongful Death General Negligence Please briefly describe the nature of the stitioner sustained injuries when his vehicle	Auto: Property I Auto: Uninsured Asbestos: Person Premise Liability Intentional Prop Unfair Business Fraud Professional Neg Medical Malprad Toxic Tort Other Tort (desc Redhibition Class action (nate	I Motorist nal Injury/Death y erty Damage Practice gligence ctice cribe below) ture of case)
Following the completion of this form by c litigant, this document will be submitted to Louisiana, by the Clerk of Court.	ounsel, counsel's represen the Office of the Judicial	tative, or by the self-represented Administrator, Supreme Court of
Name, address and contact information of p	person completing form:	
Name Brian C. Colomb	Signature	
Address 2505 Verot School Road, Lafayette	, LA 70508	
Phone number: 337-541-6584	E-mail address: brian@g	getgordon.com

Lafayette Parish Filed Apr 22, 2022 9:13 AM Simone Vaughan Deputy Clerk of Court C-20221832



2505 Verot School Road Lafayette, LA 70508 337-347-7565 – Telephone 337-704-2805 - Facsimile

April 18, 2022

Lafayette Parish Clerk of Court ATTN: CIVIL 800 S Buchanan Street Lafayette, LA 70501

RE:

Skye Robertson

v. Buzrukhuja Toshhujaev, et al Docket No. C-20221832 D

Dear Clerk:

Please find enclosed for filing an Affidavit for Service. Please return a filed copy to my office. Per the clerk, we have enough money on file to cover costs.

STAMPED COPY MAILED April 22, 2022 HD

If you have any questions, please contact Gabbie in my office at 337-347-7565. Thank you.

Sincerely yours,

Brian Colomb

BCC/gmd Enclosures Lafayette Parish Filed Apr 22, 2022 9:13 AM Simone Vaughan Deputy Clerk of Court

C-20221832 D

SKYE ROBERTSON

15TH JUDICIAL DISTRICT COURT

VERSUS

DOCKET NO. C-20221832 D

BUZRUKHUJA TOSHHUJAEV,

LAFAYETTE PARISH, LOUISIANA

ET AL

AFFIDAVIT OF SERVICE

STATE OF LOUISIANA

PARISH OF LAFAYETTE

BEFORE ME, the undersigned Notary, personally came and appeared Gabrielle Melancon, who did depose and state that:

On April 18, 2022, I deposited in the United States mail, enclosed in envelopes and properly addressed to the defendant, Diamond Cargo Inc., sent by Certified Mail, Return Receipt Requested, Receipt No. 7021 2720 0001 2586 4177 (see Exhibit "A" attached), a Citation and copy of Plaintiff's Petition for Damages in the above matter.

WITNESSES:

GABRIELLE MELANCON

NOTARY PUBLIC DAWN O. DOUCET Notarial # 48785 Lafayette Parish
Filed Apr 22, 2022 9:13 AM
Simone Vaughan
Deputy Clerk of Court

COMPLETE THIS SECTION ON DELIVERY A. Signature C. Date of Delivery C. Date of Delivery	D. is delivery address different from item 1? ☐ Yes if YES, enter delivery address below: ☐ No	Service Type Adult Signature Adult Signature Adult Signature Adult Signature Adult Signature Adult Signature Certified Mail Restricted Delivery Collect on Delivery Co	053 S. MOCARJOM Domestic Return Receipt	CERTIFIED MAIL® RECEIPT Domestic Mail Only For delivery information, visit our website at www.usps.com For delivery information, visit our website at which we were at the content of	XIta Sarvices & Fees (check box, edd fee at appropriete) Return Receipt (hardcopy) Sequent Receipt (hardcopy) Control Mail Restricted Delivery And Signature Restricted Delivery \$	Sent to Diamond (ango Inc. / Nodir Affair To Street and
TON the reverse o you. he mallplece,	or on the mont it space permits. 1. Article Addressed to: Diannand Cargo Inc. Nodir Affricov 5535 Starting Laked Circle, AR. 20	2. Article Number (Transfer from service label)	000-9053 (U.S. P	22Th 985 22Th 985	50 000 5 50 000 5	154 75 4507 75 4507



Lafayette Parish Filed Apr 22, 2022 9:15 AM Simone Vaughan Deputy Clerk of Court C-20221832



2505 Verot School Road Lafayette, LA 70508 337-347-7565 – Telephone 337-704-2805 - Facsimile

April 18, 2022

Lafayette Parish Clerk of Court ATTN: CIVIL 800 S Buchanan Street Lafayette, LA 70501

RE:

Skye Robertson

v. Buzrukhuja Toshhujaev, et al Docket No. C-20221832 D

Dear Clerk:

Please find enclosed for filing an Affidavit for Service. Please return a filed copy to my office. Per the clerk, we have enough money on file to cover costs.

If you have any questions, please contact Gabbie in my office at 337-347-7565. Thank you.

Sincerely yours,

STAMPED COPY MAILED April 22, 2022 HD

Brian Colomb

BCC/gmd Enclosures Filed Apr 22, 2022 9:15 AM Simone Vaughan Deputy Clerk of Court

SKYE ROBERTSON

15TH JUDICIAL DISTRICT COURT

VERSUS

DOCKET NO. C-20221832 D

BUZRUKHUJA TOSHHUJAEV,

LAFAYETTE PARISH, LOUISIANA

ET AL

AFFIDAVIT OF SERVICE

STATE OF LOUISIANA

PARISH OF LAFAYETTE

BEFORE ME, the undersigned Notary, personally came and appeared Gabrielle Melancon, who did depose and state that:

On April 18, 2022, I deposited in the United States mail, enclosed in envelopes and properly addressed to the defendant, Buzrukhuja Toshhujaev, sent by Certified Mail, Return Receipt Requested, Receipt Nos. 7021 2720 0001 2586 4160 (see Exhibit "A" attached) and 7021 2720 0001 2586 4153 (see Exhibit "B" attached), a Citation and copy of Plaintiff's Petition for Damages in the above matter.

WITNESSES:

NOTARY PUBLIC DAWN O. DOUCET

Notarial # 48785

C-20221832 D Simone Vaughan Deputy Clerk of Court ☐ Agent ☐ Addressee C. Date of Delivery Domestic Return Receipt COMPLETE THIS SECTION ON DELIVERY D. is delivery address different from item 1?If YES, enter delivery address below: | Adult Bignature | Adult Bignature | Captar | Captar Bignature | Captar Captar Delivery | Capter on Delivery | Capter on Delivery | Captar Bignature | Captar Bignat B. Received by (Printed Name) PS Form 3811, July 2020 PSN 7630-02-000-8053 S. POLYCLON / CMMO A. Signature Attach this card to the back of the mailpiece, 7021 2720 0001 2586 4160 ■ Print your name and address on the reverse 9590 9402 6603 1028 5900 31 so that we can return the card to you. SENDER: COMPLETE THIS SECTION Buzrukhuja Toshhujaev 2. Article Number (Transfer from service label) 1738 Banill Road, #1 Brooklyn, NY 11223 or on the front if space permits. ■ Complete items 1, 2, and 3. 1. Article Addressed to:

Lafayette Parish

Filed Apr 22, 2022 9:15 AM

For delivery information, visit our website at www.usps.com Postmark Here CERTIFIED MAIL® RECEIPT CLOSKISM NA Sent To BULY WEAVING Adult Signature Restricted Delivery Certified Mail Restricted Delivery Adult Signature Required Total Postage and Fees Jily, State, 21P+4 09Th 9852 סססד 0575 TOOL 0974 9852 TOOO 0575



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Lafayette Parish
Filed Apr 22, 2022 9:45 AM
Simone Vaughan
Deputy Clerk of Court

A. Signature X. Signature X. Expension of the control of the con	3. Service Type 1. Adust Signature 1. Adust	U.S. Postal Service" CERTIFIED MAIL® RECEIPT Domestic Mail Only For delivery information, visit our website at www.usps.com. Cartified Mail Fee String Services & Fees (check box, end fee as appropriate) String Services & Fees (check box, end fee as appropriate) String Mail Receipt (budgooy) Strain Receipt (budgooy) Strain Receipt (budgooy) Strain Services & Fees (check box, end fee as appropriate) Adult Signature Restricted Delivery \$ Sent To Many Wakhuy a Toshhuwkey
SENDER: COMPLETE THIS SECTION Complete froms 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the maliplece, or on the front if space permits. Article Addressed to: BUZYUK NA JA TOSNNW JAEV 3ALT S Challe (Ircle) BEAVERCER 10H 45431	3. Service Type 3. Service Type 5. Aut 8 gradue 9590 9402 6603 1028 5900 17 2. Article Number (Transfer from service label) 7 D Z J. Z 7 Z D D D D J. Z 5 B L 4 J S Insured Mail Restricted Delivery Restricted 1. Service Type 1. Aut 8 gradue Restricted Delivery 1. Centrol Mail Restricted Delivery Restrict	U.S. Postal Service" U.S. Postal Service" CERTIFIED MAIL CERTIFIED MAIL CERTIFIED MAIL Domestic thail only For delivery information. visit ou CERTIFIED MAIL CERTIFIED MAIL CERTIFIED MAIL For delivery information. visit ou CERTIFIED MAIL CERTIFIED MAIL CERTIFIED MAIL CERTIFIED MAIL CONTINUES ON TO COME SET



Lafayette Parish Filed May 05, 2022 Martina Reaux

C-20221832 D

Martina Reaux Deputy Clerk of Court E-File Received May 05, 2022 4:01 PM

P-777

15TH JUDICIAL DISTRICT COURT FOR THE PARISH OF LAFAYETTE STATE OF LOUISIANA

NO. C-20221832

DIVISION "D"

SKYE ROBERTSON

vs.

BUZRUKHUJA TOSHHUJAEV, DIAMOND CARGO, INC. and PROGRESSIVE CASUALTY INSURANCE COMPANY		
FILED: DEPUTY CLERK		
MOTION FOR EXTENSION OF TIME		
NOW INTO COURT, through undersigned counsel, comes defendant, Progressive		
Preferred Insurance Company, incorrectly referred to Progressive Casualty Insurance		
Company, in the above entitled and numbered cause and on suggesting to this Honorable		
Court that defendant requires an additional thirty (30) days within which to file responsive		
pleadings to plaintiff's Petition for Damages.		
IT IS ORDERED that defendant, Progressive Preferred Insurance Company,		
incorrectly referred to Progressive Casualty Insurance Company, be and is hereby granted		
an additional thirty (30) days from the date of signing this Order, within which to file		
responsive pleadings to plaintiff's Petition for Damages.		
Lafayette, Louisiana, this day of, 2022.		
Respectfully submitted,		
KIEFER &/KIEFER		
CHRIS M. SHORT (#32689)		
NAT G. KIEFER, JR. (#1461)		
AMANDA G. MORSE (#35137)		
2310 Metairie Road		
Metairie, Louisiana 70001		
Telephone: (504) 828-3313 Facsimile: (504) 828-0024		
Email: cshort@kieferlaw.com		
CERTIFICATE OF SERVICE		

I hereby certify that a copy of the above and foregoing have been forwarded to all counsel of record by via U.S. mail, email, or facsimile, this 5th day of 2022.

Chris M. Short